

Category #27:

The use of cleaning products should be non-corrosive to skin or inanimate surfaces.

State Response:

Corrosive to skin and severe skin irritation are synonymous. Canada's Environmental Choice requires that general purpose cleaning agents cannot be labeled as irritants. Green Seal requires that the undiluted product shall not be corrosive to the skin or eyes. OGS has adopted Green Seal guidelines for general purpose cleaning products. Corrosive to inanimate surfaces would not be considered a health concern. If a specific concern can be identified and a test methodology for evaluating this concern, NYS would support a review and revision of the criteria to address the concern. Regarding pH levels, low and high pH can be an important aspect of cleaning performance particularly since soils themselves have different pHs. Green Seal allows a pH range of 2.5 to 11 for degreasing agents and Canada's Environmental Choice allows for a pH range between 3 and 11. Since there are no data to support a range of pH levels between 4 and 9, and pH levels are an important aspect of cleaning performance for specific products based on the soil being treated, OGS will allow the established levels determined by Green Seal for degreasing agents. OGS would support a review and revision of the criteria to see if they can be further improved while still allowing for reasonable variety and innovation in the market.

Frequently Asked Public Comment:

Non-Corrosive to Skin or Inanimate Surfaces: (A) pH Level Between 4 and 9

--Must not be corrosive to skin or inanimate surfaces (Apply to Tier I Products).

(Deirdre Imus, Founder and President, The Deirdre Imus Environmental Center for Pediatric Oncology, Hackensack University Medical Center, The David Joseph Jurist Research Center For Tomorrows Children, Hackensack, NJ 07601)

--Should have a pH level between 4 and 9 wherever possible (Apply to Tier I Products).

(Deirdre Imus, Founder and President, The Deirdre Imus Environmental Center for Pediatric Oncology, Hackensack University Medical Center, The David Joseph Jurist Research Center For Tomorrows Children, Hackensack, NJ 07601)